

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY**

KIMBERLEE WILLIAMS, et al.

Plaintiffs,

vs.

BASF CATALYSTS LLC, et al.

Defendants.

No. 2:11-cv-01754 (JAD)

CIVIL ACTION

**[PROPOSED] ORDER GRANTING
CLASS COUNSEL’S PETITION FOR APPROVAL
AND GRANT OF AWARDS OF CLASS COUNSEL’S
ATTORNEYS’ FEES, CLASS COUNSEL’S
REIMBURSEMENT OF LITIGATION EXPENSES, AND
CLASS REPRESENTATIVE SERVICE AWARDS**

Class Counsel having filed a petition (“Petition”) for (i) an award of attorney’s fees and reimbursement of costs and litigation expenses for Class Counsel’s work to date in this litigation; and (ii) incentive awards to the Class Representatives for their invaluable contributions they made to the achievement of the Settlement, pursuant to Rule 23(h) of the Federal Rules of Civil Procedure, the Court’s Preliminary Approval Order (ECF No. 623), and Section 13 of the Class Action Settlement Agreement, and the matter having come on consideration by the Court;

NOW, on this _____ day of _____, 202_, upon consideration of the Petition, it is ORDERED, ADJUDGED, and DECREED, that the Petition be, and hereby is, GRANTED; and

IT IS FURTHER ORDERED as follows:

1. The Court awards \$22,500,000 in attorney's fees to Class Counsel.
2. The Court awards Class Counsel reimbursement of costs and litigation expenses of \$1,038,300.27.
3. All attorney's fees and reimbursement of costs and litigation expenses shall be paid by Defendants BASF Catalysts, LLC ("BASF") and Cahill, Gordon & Reindel LLC ("Cahill"), pursuant to Section 13.1 of the Class Action Settlement Agreement.
4. Class Representatives Kimberlee Williams, Gayle Williams, Marilyn L. Holley, Sheila Ware, Donnette Wengerd, and Roseanne Chernick shall each be paid incentive awards of \$50,000, pursuant to Section 13.2 of the Class Action Settlement Agreement.

BY THE COURT

Hon. Joseph A. Dickson
United States Magistrate Judge